

McKESSON

Empowering Healthcare

Via Email and Certified Mail

October 12, 2012

Mr. Ruben Moya, Superfund Remedial Project Manager
Superfund AR/LA Enforcement Section (6SF-RA)
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202

**Subject: Response to 8/22/12 EPA Comments on
Groundwater Remediation Summary
Arkwood, Inc. Site, Omaha, Arkansas**

Dear Mr. Moya:

Responses to the comments received from the EPA dated August 22, 2012 on the Groundwater Remediation Summary for the Arkwood Site are presented below. On September 27, 2012, we were provided with an extension until October 12, 2012 to respond to these comments. The agency comments are presented below followed by McKesson's responses in italics.

EPA Comment 1: Operation of the pilot injection system is to be ceased in the month of September 2012. This cessation of operations is expected prior to any required monitoring in the month of September 2012.

Response: *Operation of the pilot injection system was discontinued on September 10, 2012. Operational samples were collected on September 24, 2012.*

EPA Comment 2: Starting from September 2012, required monitoring is to continue on a monthly basis, with additional collection of temperature, pH, and dissolved oxygen measurements. Monitoring will continue until EPA, with ADEQ consultation, deems that such monitoring will no longer be needed.

Response: *The additional monitoring parameters will be collected at the effluent of the main treatment system. Per a request from ADEQ, the sample location point will be at the furthest point downstream before the effluent enters either the subsurface or the culvert adjacent to Old Cricket Road. The collection location will be documented in the monthly progress report.*

EPA Comment 3: EPA has continued concerns on the fate and transport of Pentachlorophenol (PCP) contaminated groundwater from the site. These concerns (detailed in Enclosure 2) arise from the review of the previous 1991 dye tracing study, as well as the lack of groundwater monitoring other than at the mouth and weir at New Cricket Spring. McKesson is directed to

submit a proposal in September 2012 that details the steps that will be taken to alleviate these concerns.

Response: Please see the enclosed letter from Mr. Thomas Aley of Ozark Underground Laboratory, Inc. that responds to the concerns raised in this comment. Based upon Mr. Aley's review and my knowledge, we do not believe that any additional groundwater fate and transport investigation is required or appropriate at the Arkwood Site.

I certify that the information contained in or accompanying this submission is true, accurate, and complete to the best of my knowledge, information and belief, and that I, as project coordinator, have made reasonable inquiry into its veracity.

If you have any questions regarding our responses, please do not hesitate to contact me at (608) 848-4134.

Sincerely,



Jean A. Mescher, Project Coordinator
Director, Environmental Services

Enclosure

Copy:

- Mark Moix, ADEQ*
- EPA Assistant Regional Counsel (6C-WA)* (w/o enclosure)
- Chief, Superfund Enforcement Branch (6H-E)* (w/o enclosure)

* CERTIFIED MAIL